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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:

Chapter 11
Case No.: 23-71078-las

GREEN POINT MANAGEMENT SYSTEMS, LLC,

Debtor.
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DECLARATION OF WAYNE GREENWALD
PURSUANT TO LOCAL BANKRUPTCY RULE 9077-1,
IN SUPPORT OF THE DEBTOR’S MOTION SEEKING AN
***EX PARTE* ORDER SETTING A HEARING FOR AND REDUCING NOTICE FOR THE**
DEBTOR’S MOTION FOR AN ORDER SETTING BIDDING PROCEDURES

TO: HON. LOUIS A. SCARCELLA
UNITED STATES BANKRUPTCY JUDGE

Wayne Greenwald declares:

1. I am senior counsel in the law firm of Jacobs PC, counsel to the Debtor, Green Point Management Systems, LLC (the “Debtor”).
2. I have personal knowledge of the statements contained herein.
3. I submit this declaration, pursuant to this Court’s Local Rule 9077-1 in support of the Debtor’s request that its motion seeking orders regarding scheduling an auction and establishing bidding procedures regarding the sale of the Debtor’s condominium located at 231 Norman Avenue, Suite 106, Brooklyn, New York (the “Property”), free and clear of liens, interests and encumbrances (the “Sale Procedure Motion”) be made by an order setting a hearing and shortening the notice period for that hearing, pursuant to

**THE NEED FOR AN ORDER SCHEDULING
A HEARING ON REDUCED NOTICE**

4. As described in the Sale Procedure Motion, the Debtor must comply with the terms of the Settlement Order it reached with the U.S. Trustee to which, among other things, provide for the sale of the Property (the “Order”)
5. The Order requires the Debtor have an auction for the Property by November 8, 2023.
6. Fed.R.Bankr.P. 2002 provides that motions seeking authority to sell property be made on 21 days notice.
7. That length of notice would provide the Debtor with sparse time to market the Property.
8. Applying Fed.R.Bankr.P. 2002's time to this Motion would dangerously reduce the Debtor's time to market the Property and publicize the auction,
9. If the hearing on the Sale Procedure Motion were not expedited, the Debtor's ability to comply with the Order would be jeopardized.
10. No party in interest will be prejudiced materially by expediting the hearing on the Sale Procedure Motion.
11. Instead, they will benefit them by enabling the Debtor to achieve the highest sale price for the Property.
12. No previous application for similar relief has been made to this or any other Court.
13. I declare forgoing statements of fact to be true and correct to the best of my knowledge,

under penalties of perjury, pursuant to 28 U.S.C. § 1746

Dated: New York, NY
September 22, 2023

/S/ Wayne M. Greenwald
Wayne M. Greenwald